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United States Bankruptcy Court
for the District of New Jersey

In the Matter of

DHAVAL Y. PUROHIT

**CHAPTER 13
CASE NO. 22-16869-CMG**

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

Creditor, **Mira D. Purohit**, respectfully moves that the debtor's plan be denied confirmation pursuant to 11 U.S.C. §§ 1325 (a)(3), 1325(a)(6), 1325(a)(7) and Bankruptcy Rule 3015(f).

IN SUPPORT THEREOF, the creditor states:

1. The debtor filed a voluntary petition seeking relief under Chapter 13 on August 30, 2022. Objecting creditor herein, Mira D. Purohit ["Creditor"], is the estranged wife of the debtor and herself is a debtor in a separate pending Chapter 13 matter [Case #22-16817-CMG].

2. The debtor's proposed plan seeks the sale of real property at 1 Mink Run Court, North Brunswick, New Jersey, which is the former marital residence of debtor and Creditor. The home is now occupied by Creditor and her three teenaged children. Said property is jointly owned by Debtor and Creditor as tenants by entirety. A foreclosure action is pending by the mortgage holder of said

property.

3. Creditor's proposed plan seeks to cure the mortgage arrears and remain in ownership and occupancy of the property. Creditor has been making mortgage and trustee plan payments in an effort to keep a roof over the heads of herself and her children. She does not want to sell the property and relocate her family. Any attempt to sell the property would not be feasible without her consent and joinder; accordingly, the proposed plan is not confirmable.

FOR THE FOREGOING REASONS, the within creditor respectfully requests that confirmation of the debtor's plan be denied and the debtor's case be dismissed.

Dated: September 29, 2022

/s/ Warren Brumel, Esq.
WARREN BRUMEL, ESQ.
Attorney for Creditor, Mira D. Purohit